



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

APR 08 2015

Robert H. Smith  
Chairman  
Pala Band of Mission Indians  
PMB 50, 35008 Pala Temecula Road  
Pala, California 92059

Dear Chairman Smith,

The U.S. Environmental Protection Agency Region 9 is pleased to announce the availability of financial assistance as follows. A complete single application and final workplan must be submitted using grants.gov.

APPLICATION DUE DATE: MAY 13 2015

TYPE: New Cooperative Agreement

PROGRAM TITLE: Performance Partnership Grant (PPG)

STATUTORY AUTHORITY: Appropriation Act of 1996 (PL-104-134)

CATALOG OF FEDERAL  
DOMESTIC ASSISTANCE NO.: 66.605

DELEGATION OF AUTHORITY: 1-101 Performance Partnership Grants

FEDERAL FUNDS AVAILABLE and REQUIRED NON-FEDERAL MATCH:

PROGRAM (Sample)	Federal Amount Available	Required Match* (*Based on Total Project Cost)	TOTAL
CWA-106 (Water Pollution Control)	\$70,000	\$3,684	\$73,684
CWA-319 (Non-point Source) - BASE	\$30,000	\$1,579	\$31,579
General Assistance Program (GAP) - FY16 CORE - FY16 SUPPLEMENTALS - FY17 CORE - FY17 SUPPLEMENTALS	\$112,000 \$7,500 \$115,000 \$5,000	0%	\$239,500
PPG TOTAL:	\$339,500	\$5,263	\$344,763

Please submit the additional information requested as follows:

- 1) *Revised workplan components and budget for GAP based on the attached EPA comments.*
- 2) *All revised CWA 319 and CWA 106 workplan comments were addressed and no additional revisions required at this time.*

A complete single application with one workplan and budget reflecting the above comments must be submitted by the due date indicated. In completing your application, enter the Catalog of Federal Assistance Number (CFDA) for PPGs – 66.605 – in box #11 on SF-424A application form, not the CFDA for any of the individual grant programs going into the PPG.

Effective **February 17, 2015**, EPA grant applicants must use Grants.gov to submit their applications. The Grants.gov registration process can take up to 30 days to complete. Therefore, it is highly recommended that EPA applicants complete their registration on grants.gov now. Also, your organization's registration in SAM.gov must be active to utilize Grants.gov. If it appears that the grants.gov registration process may prevent you from submitting your application by the due date aforementioned, then please contact [support@grants.gov](mailto:support@grants.gov) or call 1-800-518-4726 as support is available 24 hours a day and 7 days a week. You should also notify your Project Officer before the application due date to request an extension.

Please review both Attachment 2 on grants.gov instructions and Attachment 3 on Region 9 Guidance Information for Applicants (or go to <http://www.epa.gov/region9/funding/information.html>) for additional resources on Grants.gov, Federal Regulations, and new EPA requirements. We suggest you forward these materials to your Project Manager, Financial Officer and any other personnel in your organization requiring this information.

Since there may have been changes to various EPA assistance regulations, please remember to obtain a copy of the Code of Federal Regulations, Title 40, Parts 1-49. This CFR is updated every July 1 and includes the Chapter I, Subchapter B, which are regulations applicable to your cooperative agreement. The CFR is available through the internet at the following address: <http://www.epa.gov/region09/funding/before.html>.

Questions regarding the application or administrative/fiscal matters should be referred to Martha Villarreal, of the EPA Region 9 Grants Management Office, at (415) 972-3666 or [Villarreal.martha@epa.gov](mailto:Villarreal.martha@epa.gov). Please contact your Project Officer, Pamela Overman at (415) 972-3781 or [overman.pamela@epa.gov](mailto:overman.pamela@epa.gov) regarding programmatic questions (e.g. development of final PPG workplan).

Sincerely,



Laura M. Ebbert  
Manager  
Tribal Section

#### Attachments

1. GAP Workplan comments
2. Grants.gov Instructions Guide
3. Region 9 Guidance information for Applicants

cc: Theresa Nieto, Tribal Treasurer  
Shasta Gaughen, Environmental Director

**GAP 2015-2016 and 2016-2017 Work Plan Comments**  
**Pala Band of Mission Indians**

Thank you for submitting a work plan that is in line with the 2013 GAP Guidance. The following comments and requests were written with the intent of ensuring the work plan meets GAP guidelines, strengthening the Tribe's GAP work plan, and identifying possible assistance. These comments pertain to the 2015-2016 and 2016-2017 work plans that were submitted with your GAP proposal in December 2014. **Please ensure that these comments are addressed in your final PPG work plan.**

**General Comments**

1. **Reference Documents:** The following reference documents should be referred to while building your GAP workplan:
  - 2013 Guidance on the Award and Management of General Assistance Program Agreements and Appendix I, Guidebook for Building Tribal Environmental Program Capacity  
<http://www.epa.gov/region9/funding/pdfs/tribal-gap/r9-gap-guidance.pdf>
  - GAP Act (<http://www.epa.gov/Indian/pdfs/4368b.pdf>)
  - 2015 GAP Grant Notification (<http://www.epa.gov/region09/funding/tribal-gap.html>)
  - EPA Strategic Plan (<http://www2.epa.gov/planandbudget/strategicplan>)
2. **Environmental outcomes** should be expressed in terms of improvements to public health, the environment, or human behavior. They can also reflect improved tribal capacity to protect public health or the environment. Intermediate outcomes could reflect: a) improved human health or environmental conditions, b) reduced risks to human health or the environment, c) increased tribal capabilities in legal, enforcement, technical, communication, or administrative areas. Long-term outcomes could include attainment of desired environmental conditions (e.g., water quality standards are met) or human health goals, attainment of a desired capacity to plan, develop, implement, manage and sustain tribal environmental programs.
3. **Capacity Indicators:** Capacity indicators represent the desired destination of the Tribe's environmental work. Therefore, the Tribe should provide enough detail to describe how it will complete each commitment which is necessary to achieve the indicators proposed in each component. Please ensure that each component in your work plan identifies the capacity indicators that appropriately link to the steps that are either underway or proposed in the associated commitments. Capacity indicators should be placed in the "Measures" section for each component in the work plan, should identify the associated Guidebook indicator number, and be written out. More information on the use of indicators can be found on page 12 of 22 of the GAP Guidance. A suite of indicators that the Tribe may consider for inclusion in its work plan is contained in Appendix I of the GAP Guidebook.
4. Please ensure that the total work plan **Estimated Component Costs** add up to the total approved budget amount indicated in the cover letter, and that the total work plan Estimated Work Years adds up to the total number of approved personnel funded under GAP. I have attached a document entitled "Component Cost and Work Years Guidance" that will help you to correctly identify Component Costs and Work Years to comply with this request.
5. **Greening Grants Policy:** EPA Region 9 has adopted a Greening Grants Policy which encourages grantees to carry out their EPA grant funded projects in a greener way. Your Project Officer will

work with you to determine whether it is feasible to incorporate green practices into your work plan. The Greening Grants Policy includes an attachment which describes many useful green practices. The policy furthers the objectives of EPA's 2011-15 Strategic Plan. The link to Greening Grants Policy is on the Region 9 Website Homepage, <http://www.epa.gov/region9/funding/greening-grants.html>

6. **Indirect Costs:** Please refer to CFR 2, Part 200, Section 200.414 for more information regarding indirect cost rates.
7. Please ensure each commitment provides **why** the Tribe has proposed each activity, **who** will need to do **what**, **where**, **when** and **how**, to complete proposed activities. This type of information helps quantify the level of effort (FTE and Cost) required to complete commitments, which in turn helps project officers determine if identified costs appear reasonable. Build this type of information into each of your commitment descriptions.

### **FY15-16 BUDGET COMMENTS**

All funding amounts are tentative until the final amounts are received in an award document.

FY16 GAP funding is tentatively approved in the amount of \$112,000.

In addition, GAP supplemental funding is tentatively approved for:

- \$2,500 for IT digital media development
- \$5,000 for a consultant to assist with a drought contingency plan

### **FY15-16 WORK PLAN COMMENTS**

#### **Component 1. Environmental Program Administration and Oversight; Summarize Progress; Jointly Evaluate Performance**

Commitment 1.1. Please revise the reporting commitment to include: The Tribe will prepare and submit quarterly progress reports to self-evaluate and to jointly evaluate annual performance under the grant to include providing: status of each workplan component, commitment, output/deliverables and outcomes; status of expenditures for the reporting period; summary of accomplishments including the reporting of environmental results and discussion of problems impacting or expected to impact performance; and tasks not on schedule and proposed dates of completion. Each report is due on the 30th day after the end of the quarter i.e., January 30, April 30, July 30, and October 30. The recipient shall submit a final report within 90 days of the end of the project period.

Commitment 1.2: Please move the oversight of the tribal transfer station to a separate commitment. Please add commitments to support the development of the indicators that are listed for this commitment.

Deliverable 1.2: Most of the statements in this section are commitments and not deliverables. Please move the statements of work to the commitment section. Please move the quarterly reporting and financial reporting to commitment or deliverable 1.1 so that it is only in one place.

Commitment 1.4: Parts of this commitment may not be GAP eligible. Please expand on the goals of this commitment by describing **why** the Tribe has proposed this activity and **who** will need to do **what**, **where**, **when** and **how**, to complete proposed activities



## **Component 2. Training/Education/Travel**

Commitment 2.1: There appears to be at least three commitments of work described in this one commitment. You may want to consider separating each activity into an individual commitment and describing **who** will need to do **what**, **where**, **when** and **how**, to complete proposed activities.

## **Component 3. Environmental Compliance and General Coordination of Tribal Environmental Projects as Needed**

Commitment 3.1: You may want to also consider capacity indicator D.3.7 for this work, if this is the goal of this commitment.

Commitment 3.3: Maintaining compliance with federal environmental regulations and regulating businesses is not a GAP eligible activity. However, the development of the procedures and policies to achieve the stated capacity indicators are eligible activities. Please provide a more clear description of what policies and procedures will be developed under this commitment and include them as specific deliverables.

## **Component 4. Community Outreach/Public Education**

Commitments 4.1-4.2: Please replace the references to preparing outreach documents and newsletters with the need to develop new specific methods and/or materials. The GAP Guidebook and direction provided from the American Indian Environmental Office indicate that outreach and education activities need to continually evolve or they will be considered implementation activities, which cannot be supported with GAP funds. Tribes that have successfully developed capacity in a given area can continue to receive GAP funding to expand, enhance, or evolve their capacity. For example, a tribe with a community education program may continue to receive GAP funds to expand the program by adding new features, such as outreach strategies for vulnerable groups (i.e., children, the elderly, people in poor health, and expectant mothers) or identifying new media outlets to reach target audiences. (GAP Guidebook, A.3 Page 2 of 42 and GAP Guidance FAQs A A.3)

Please ensure that the newsletters described in each of these commitments are different newsletters, or combine work.

Commitment 4.3: Development of web resources is a great activity to “green” your information to the community. Please remember that maintaining a website is not GAP eligible, however, updating the website with new materials developed by the environmental office is GAP eligible.

## **Component 5. Coordination of Events and Program Development for the Tribal Transfer Station Solid Waste Management Plan.**

Our records show that the Tribe has an Integrated Solid Waste Management Plan from 2005. To ensure the greatest opportunity for success of your solid waste management program, it is recommended this ISWMP be updated to reflect the current solid waste management operations and needs of the Tribe. The agency recommends that the plan be reviewed on an annual basis to ensure consistency with the Tribe’s priorities, and should be reauthorized every five years. Having an updated and relevant ISWMP is critical for maintaining a sustainable waste management program, and for identifying and organizing current waste management priorities for the Tribe. Prior to undertaking or concurrent with solid waste activities proposed in this workplan, the ISWMP should be updated and approved in this fiscal year. The Region 9 Tribal Solid Waste Team is available to provide technical assistance and a comprehensive review of the ISWMP.

Commitment 5.1: Please describe the actual activities to be conducted to describe what “continuing to assist the transfer station” means. Please refer to the GAP Guidebook and the recently developed document which is on the EPA HQ website regarding allowable solid waste activities under the GAP program: [http://www.epa.gov/tribal/gap/allowable-sw-activities\\_gap\\_dec2014.pdf](http://www.epa.gov/tribal/gap/allowable-sw-activities_gap_dec2014.pdf)

In addition, we encourage you to update your ISWMP which was last approved in 2005. If a more recent Plan was approved by the Tribe please submit a copy to EPA.

Commitment 5.2: Community cleanup events can be beneficial to remove waste from tribal lands. However, community cleanup events should not replace sustainable solid waste collection services or serve as de facto waste hauling/disposal programs. The tribe must demonstrate that the following criteria are met when submitting a revised workplan that includes a community clean-up event: the Tribe has an Integrated Solid Waste Management Plan (ISWMP) and the plan demonstrates a clear need for community cleanup events; the community cleanup event is **not** removing trash from individual homes, caused by individual users; and the Tribe has a program in place to prevent future dumping that would eventually eliminate the need for community cleanup events.

If these criteria are met, please revise this commitment to include the actual activities that will be conducted by the Environmental Director. Since clean-up/disposal funding is not requested in the budget it appears that the Environmental Department's participation is administrative. Please clarify in your revisions.

Deliverable 5.2: Please include the amount and types of waste removed, where it was disposed and amounts and types of waste that were recycled during these events.

Commitment 5.4: Please describe **who** will need to do **what**, **where**, **when** and **how**, to complete this commitment.

#### **Component 6. Develop Tribal Drought Contingency Plan**

Please contact your project officer to discuss suggested drought planning work plan changes and to obtain additional drought planning resource documents.

### **FY16-17 BUDGET COMMENTS**

All funding amounts are tentative until the final amounts are received in an award document.

FY17 GAP funding is tentatively approved in the amount of \$112,000.

In addition, GAP supplemental funding is tentatively approved for:

- \$1,000 for IT digital media development
- \$4,000 for a consultant to assist with an emergency response plan

### **FY16-17 WORK PLAN COMMENTS**

Thank you for submitting a two year work plan. Prior to October 1, 2016, your project officer will work with the Tribe to review and update the FY16-17 work plan as needed, to address any changing priorities based on the Tribes EPA Tribal Environmental Plan.

#### **Component 1. Environmental Program Administration and Oversight; Summarize Progress; Jointly Evaluate Performance**

Commitment 1.1. Please revise the reporting commitment to include: The Tribe will prepare and submit quarterly progress reports to self-evaluate and to jointly evaluate annual performance under the grant to include providing: status of each workplan component, commitment, output/deliverables and outcomes; status of expenditures for the reporting period; summary of accomplishments including the reporting of environmental results and discussion of problems impacting or expected to impact performance; and tasks not on schedule and proposed dates of completion. Each report is due on the 30th day after the end of the quarter i.e., January 30, April 30, July 30, and October 30. The recipient shall submit a final report within 90 days of the end of the project period.

Commitment 1.2: Please move the oversight of the tribal transfer station to a separate commitment. Please add commitments to support the development of the indicators that are listed for this commitment.

Deliverable 1.2: Most of the statements in this section are commitments and not deliverables. Please move the statements of work to the commitment section. Please move the quarterly reporting and financial reporting to commitment or deliverable 1.1.

## **Component 2. Training/Education/Travel**

Commitment 2.1: There appears to be at least three commitments of work described in this one commitment. You may want to consider separating each activity into an individual commitment and describing **who** will need to do **what, where, when** and **how**, to complete proposed activities.

Commitment 2.2: Wildlife, forest and habitat regulations and management issues are not GAP eligible activities. Please remove these activities from the GAP work plan.

## **Component 3. Environmental Compliance and General Coordination of Tribal Environmental Projects as Needed**

Commitment 3.1: Please clarify if the tribe has environmental disaster and emergency management planning ordinances and regulations that need updating or if new ordinances and regulations need to be developed. Please contact your project officer for assistance in further planning this activity.

Commitment 3.3: Maintaining compliance with federal environmental regulations and regulating businesses is not a GAP eligible activity. However, the development of the procedures and policies to achieve the stated capacity indicators are eligible activities. Please provide a more clear description of what policies and procedures will be developed under this commitment and include them as specific deliverables. This commitment will need to be updated prior to October 1, 2016.

## **Component 4. Community Outreach/Public Education**

Commitments 4.1-4.2: Please replace references to preparing outreach documents and newsletters with the need to develop specific new methods and/or materials. The GAP Guidebook and direction provided from the American Indian Environmental Office indicate that outreach and education activities need to continually evolve or they will be considered implementation activities, which cannot be supported with GAP funds. Tribes that have successfully developed capacity in a given area can continue to receive GAP funding to expand, enhance, or evolve their capacity. For example, a tribe with a community education program may continue to receive GAP funds to expand the program by adding new features, such as outreach strategies for vulnerable groups (i.e., children, the elderly, people in poor health, and expectant mothers) or identifying new media outlets to reach target audiences. (GAP Guidebook, A.3 Page 2 of 42 and GAP Guidance FAQs A A.3)

Please ensure that the newsletters described in each of these commitments are different newsletters, or combine work.

Commitment 4.2 and 4.3: Surveys of identical information to ten or more people must have preapproval from OMB due to the Paperwork Reduction Act. Please contact your project officer if you would like to distribute surveys under this grant.

Commitment 4.3: Development of web resources is a great activity to “green” your information to the community. Please remember that maintaining a website is not GAP eligible, however, updating the website with new materials developed by the environmental office is GAP eligible.

## **Component 5. Coordination of Events and Program Development for the Tribal Transfer Station**

Commitment 5.1: Please describe the actual activities to be conducted to describe what “continuing to assist the transfer station” means. Please refer to the GAP Guidebook and the recently developed

document which is on the EPA HQ website regarding allowable solid waste activities under the GAP program: [http://www.epa.gov/tribal/gap/allowable-sw-activities\\_gap\\_dec2014.pdf](http://www.epa.gov/tribal/gap/allowable-sw-activities_gap_dec2014.pdf)

In addition, we encourage you to update your ISWMP which was last approved in 2005. If a more recent Plan was approved by the Tribe please submit a copy to EPA.

Commitment 5.2: Please revise this commitment to include the actual activities that will be conducted by the Environmental Director. Since clean-up/disposal funding is not requested in the budget it appears that the Environmental Department's participation is administrative. Please clarify in your revisions.

Deliverable 5.2: Please include the amount and types of waste removed, where it was disposed and amounts and types of waste that were recycled during these events.

Commitment 5.4: Before these activities begin, please work with your project officer to provide a better description of how the FY17 activities will differ from the FY16 activities.

#### **Component 6. Develop Tribal Environmental Emergency/Disaster Plan**

Please contact your project officer to discuss potential EPA assistance in developing the Tribe's Emergency Response Plan.



## Component Cost and Work Years Guidance

Applications must include estimated component cost and associated work years. At present, Tribes are providing estimated costs that do not, when added together, equal the total budget request and budgeted FTE supplied with the work plan.

Suggested instructions for Tribes:

Estimated Component Costs should, when added together, equal the total budgeted amount. Two suggested ways to arrive at numbers that are equal:

- 1) Evaluate the relative *percentage* of financial resources each work plan task will take, each task being some percentage of 100; multiply that percentage by the total budgeted cost to get the estimated cost per component.

	Component 1	Component 2	Component 3	Total Budget
Percentage of Total:	25%	45%	30%	100%
Cost:	\$ 29,319	\$ 52,774	\$ 35,183	\$ 117,275

- 2) Alternately, as an addendum to calculation of the Total Program Budget, add columns wherein the contribution of each component to the total budget is calculated, and total component budgets across budget categories, applying indirect costs if applicable, personnel costs, and fringe. This "estimate" leans more toward accurate budget numbers.

Category	TOTAL	Component 1	Component 2	Component 3
(FTE)	1.5	0.375	0.6	0.525
Personnel	\$ 55,000	\$ 13,750	\$ 22,000	\$ 19,250
Fringe	\$ 18,150	4,537.50	7,260.00	6,352.50
Supplies	\$ 5,000	500	4100	400
Travel	\$ 5,000	4200	800	0
Equipment	\$ -	0	0	0
Contractual	\$ 15,000	4000	8000	3000
Subtotal	\$ 98,150	\$ 26,988	\$ 42,160	\$ 29,003
Base for Indirect	\$ 83,150	\$ 22,988	\$ 34,160	\$ 26,003
Indirect	\$ 19,125	\$ 5,287	\$ 7,857	\$ 5,981
Total	\$117,275	\$ 32,275	\$ 50,017	\$ 34,983

Estimated Component work years should, when added together, equal the total budgeted FTE for the program. One work year is equal to 2,080 personnel hours. A work year is also known as a full time equivalent (FTE), since it is based on a full time job; 40 hours per week \* 52 weeks per year = 2,080 hours per year.

Two suggested ways to arrive at numbers that are equal:

- 1) Evaluate the relative *percentage* of staffing resources each work plan component will require, each component being some percentage of 100; multiply the percentage for each component by the total requested FTE to arrive at the estimated FTE per component.

staffing	Component 1	Component 2	Component 3	Total Budget
Percentage of Total:	25%	40%	35%	100%
Cost:	0.38	0.60	0.53	1.50

- 2) Alternately, when calculating the budget in the detailed manner for the Estimated Component Cost, take the FTE applied to each component and use that value to represent the estimated component FTE.

